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DISTRICT OF NEW JERSEY
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**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

NINA AGDAL,

Plaintiff,

v.

DILLON DANIS,

Defendant.

Case No.:

ORDER TO SHOW CAUSE

THIS MATTER having been opened to the Court by Plaintiff Nina Agdal ("Plaintiff"), by and through her counsel, Sills Cummis & Gross P.C., on an application, pursuant to Federal Rule of Civil Procedure 65 and Local Civil Rule 65.1, for temporary restraints against Defendant Dillon Danis ("Defendant"); and Plaintiff having provided notice and a copy of the pleadings to Defendant by email to his manager; the Court having considered Plaintiff's Verified Complaint, the Declarations of Nina Agdal, Quincy Bahler, and Jeffrey A. Neiman, Esq. and the accompanying Memorandum of Law submitted in support of Plaintiff's application; and it

appearing that good and sufficient reasons exist to proceed by way of Order to Show Cause, and for good cause shown;

IT IS on this _____ day of _____ 2023;

1. **ORDERED** that, on the ____ day of _____, 2023, at _____, or as soon thereafter as counsel can be heard, in Courtroom _____ of the United States District Court for the District of New Jersey, Martin Luther King, Jr. Fed. Bldg. & U.S. Courthouse, 50 Walnut Street, Newark, NJ 07101, Defendant shall show cause before Hon. _____ why this Court should not grant Plaintiff's application for temporary restraints enjoining Defendant and all persons in active concert or participation with him from (1) posting sexually explicit photographs of Plaintiff on the internet without her consent, in violation of 15 U.S.C. § 6851 (the 2022 Violence Against Women Act Reauthorization) and N.J. Stat. § 2A:58D-1, and from (2) posting content in any way depicting or portraying Plaintiff that Defendant knows or has reason to believe was never meant to be shared publicly or was obtained without consent, through the hacking of any of Plaintiff's accounts or devices, or through any other illegal or unauthorized means.

2. **ORDERED** that, such restraints will remain in effect until Defendant shows cause before this Court on _____, 2023, at _____ am/pm, why this Court should not grant Plaintiff's application for an Order to Show Cause, pending trial on the merits, enjoining Defendant and all persons in active concert or participation with him from (1) posting sexually explicit photographs of Plaintiff on the internet without her consent, in violation of 15 U.S.C. § 6851 (the 2022 Violence Against Women Act Reauthorization) and N.J. Stat. § 2A:58D-1, and from (2) posting content in any way depicting or portraying Plaintiff that Defendant knows or has reason to believe was never meant to be shared publicly or was obtained

without consent, through the hacking of any of Plaintiff's accounts or devices, or through any other illegal or unauthorized means; and it is further

3. **ORDERED** that (1) failure to attend the show cause hearing shall result in the immediate issuance of the preliminary injunction, which shall be deemed to take effect immediately upon the expiration or dissolution of this Order to Show Cause, and shall remain in full force and effect while this suit is pending, and which shall provide the same injunctive relief granted by this Order to Show Cause; and (2) any act or violation of any such terms may be considered as contempt by this Court; and it is further

4. **ORDERED** that any briefs, affidavits, or other evidence in opposition to this application for Order to Show Cause, if any, shall be filed with the clerk of the Court and served upon the attorneys for Plaintiff by delivering copies thereof to Plaintiff's counsel by email on or before _____ on _____, 2023; and Plaintiff's reply papers shall be filed with the clerk of the Court and served upon Defendant by delivering copies thereof to Defendant email on or before _____ on _____, 2023; and it is finally

5. **ORDERED** that Plaintiff shall serve Defendant a copy of this Order, Summons, Verified Complaint, supporting Declarations, and Memorandum of Law within _____ day(s) from the date of this Order.

HON.